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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JOHN MEGGS,

Plaintiff,

vs.

SUN SHENG INVESTMENT LLC.,

Defendant.

Case No. 2:23-cv-1051-APG-BNW

STIPULATED JOINT DISCOVERY PLAN
AND SCHEDULING ORDER SUBMITTED
IN COMPLIANCE WITH LR 26-1(B)

Plaintiff, JOHN MEGGS, and and Defendant, SUN SHENG INVESTMENT LLC., by and through their respective counsel of record, participated in meeting required under Fed.R.Civ.P. 26(f) and which was held on January 8, 2024. Pursuant to Fed.R.Civ.P. 26(f) and LR 26-1(b), the parties stipulate to the following Joint Discovery Plan and Scheduling Order:

1. The initial disclosures to be made pursuant to Fed. R. Civ. 26(a)(1) shall be made by, **January 29, 2024**, three weeks after the date that the parties held their initial meeting

1 pursuant to Fed. R. Civ. P. 26(f).

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3 2. Unless otherwise limited by subsequent stipulations, the parties shall be allowed
4 to conduct discovery to the full extent permitted under the Federal Rules of Civil Procedure.

5 3. The attorneys of record in this matter are registered for electronic filing with this
6 Court. Any documents electronically filed with this Court are deemed to be sufficiently served
7 on the other party as of the date that the document is electronically filed with this Court.

8 Pursuant to LR 26-1(b), the parties do hereby additionally stipulate to the
9 following discovery plan and scheduling order:

10 1. **Discovery Cut-Off Date: August 5, 2024**, which is 210 days from **January 8,**
11 **2024**, the date of the Parties' 26(f) conference. Any stipulations or motions to extend discovery
12 period shall be filed no later than **July 15, 2024**, 21 days prior to the discovery cut-off, as required
13 by LR 26-4. Any stipulations or motions to extend any other deadlines set forth below shall be
14 filed no later than 21 days prior to the applicable deadline set forth below.

15 2. **Amending the Pleadings and Adding Parties**: All motions to amend the
16 pleadings or to add parties shall be filed not later than **May 7, 2024**, 90 days prior to the scheduled
17 close of discovery.

18 3. **Fed. R. Civ. P. 26(a)(2) Disclosures (Experts)**: Disclosures concerning experts
19 shall be made by **June 6, 2024**, 60 days before the close of discovery. Disclosures respecting
20 rebuttal experts shall be made by **July 8, 2024**, 30 days after the initial disclosure of experts.

21 4. **Dispositive Motions**: The date for filing dispositive motions shall be not later
22 than **September 4, 2024**, 30 days after the discovery cut-off date. In the event that the discovery
23 period is extended from the discovery cut-off date set forth in this Stipulated Discovery Plan and
24 Scheduling Order, the date for filing dispositive motions shall be extended for the same duration,
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1 \to be not later than 30 days from the subsequent discovery cut-off date.

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3 5. **Pretrial Order**: The date for filing the joint pretrial order shall be not later than
4 **October 4, 2024**, 30 days after the date set for filing dispositive motions. In the event that
5 dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until
6 30 days after decision on the dispositive motions or until further order of the court.

7 6. **Fed. R. Civ. P. 26(a)(3) Disclosures**: The disclosures required by Fed. R. Civ.
8 P. 26(a)(3), and any objections thereto, shall be included in the pretrial order.

9 7. **Alternative Dispute Resolution**: The parties certify that they met and conferred
10 about the possibility of using alternative dispute-resolution processes including mediation,
11 arbitration, and early neutral evaluation. The parties agree that this matter is appropriate for the
12 court's early neutral evaluation program.

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14 8. **Alternative Forms of Case Disposition**: The parties certify that they considered
15 consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73, and to the
16 use of the Short Trial Program (General Order 2013-01). The parties did not agree to consent to
17 trial by magistrate judge or to the use of the Short Trial Program.

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9. **Electronic Evidence**: The parties certify that they discussed whether they intend to present evidence in electronic format to jurors for the purposes of jury deliberations. The parties have agreed to produce electronically-stored evidence in either paper or .pdf format, absent a showing of good cause for such evidence to be produced in native format.

Dated: January 10, 2024

Dated: January 10, 2024

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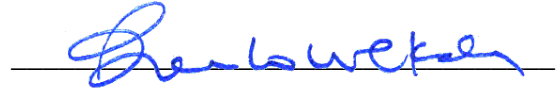
¹ Defendant SHINJUKU, LLC has already settled with the Plaintiff, and a Stipulation to Dismiss with Prejudice will be filed with the Court, and as such, they are not a signatory to this Joint Discovery Plan.

Defendant LE PRIVE HOSPITALITY, LLC has not appeared in this action, and as such, they are not a signatory to this Joint Discovery Plan.

ORDER

IT IS SO ORDERED.

Dated: 1/11/2024.

A handwritten signature in blue ink, appearing to read "D. L. W. E. K. E. N.", is written over a horizontal line.

United States Magistrate Judge